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8 Attorneys for X Corp., successor in interest to named defendant Twitter, Inc.

9 UNITED STATES DISTRICT COURT
10 CENTRAL DISTRICT OF CALIFORNIA

11 RICHARD JACKSON, JULIE
12 BRIGGS, and GREGG
BUCHWALTER, Individually And On
13 Behalf Of All Others Similarly Situated,
Plaintiffs,

14 vs.

15 TWITTER, INC., a Delaware
corporation; GOOGLE, LLC, a limited
16 liability company; ALPHABET, INC., a
Delaware corporation; META
17 PLATFORMS, INC., a corporation
doing business as "META" and
18 "FACEBOOK, INC."; INSTAGRAM,
INC., a Delaware corporation;
19 AMAZON INC., a Delaware
corporation; YOUTUBE INC., a
20 Delaware corporation; APPLE, INC., a
Delaware corporation; AMERICAN
21 FEDERATION OF TEACHERS;
NATIONAL EDUCATION
22 ASSOCIATION; NATIONAL
SCHOOL BOARD ASSOCIATION;
23 DNC SERVICES CORPORATION, a
corporation doing business nationwide
24 as, "THE DEMOCRATIC NATIONAL
COMMITTEE" OR "DNC,"

25 Defendants.

CASE NO. 2:22-cv-09438-AB (MAA)

**JOINT STIPULATION
REGARDING FILING OF FIRST
AMENDED COMPLAINT AND
CONTINUING SCHEDULING
CONFERENCE**

*[Filed Concurrently with Declaration of
Tanya L. Greene and [Proposed]
Order]*

Complaint Filed: December 29, 2022

1 WHEREAS, Twitter filed a Motion to Strike Class Action Claims and
2 Allegations on April 26, 2023 (ECF. No. 55)⁴;

3 WHEREAS, Defendants' Motions are set to be heard on June 9, 2023 (ECF
4 Nos. 34, 41, 48, 51, 53, 55, and 56) ("Motions Hearing");

5 WHEREAS, the Scheduling Conference is currently set for June 30, 2023
6 (ECF No. 58);

7 WHEREAS, following the filings of Defendants' Motions, Plaintiffs'
8 counsel has advised that Plaintiffs intend to file a First Amended Complaint
9 pursuant to Federal Rule of Civil Procedure 15(a)(1);

10 WHEREAS, the Parties have conferred and agree that Plaintiffs may have
11 up to May 24, 2023 to file a First Amended Complaint;

12 WHEREAS, the Parties have further conferred and agreed that to promote
13 efficiency given the anticipated First Amended Complaint and Defendants'
14 potential renewed motions in response thereto that, subject to the Court's approval,
15 the Scheduling Conference set for June 30, 2023 should be vacated and
16 rescheduled to a date after any renewed motion to dismiss and/or motion to strike
17 briefing is complete;

18 WHEREAS, "[a] request to continue the scheduling conference will be
19 granted only for good cause." Order Setting Scheduling Conference at 5, ECF No.
20 35;

21 WHEREAS, there is good cause for the continuance of Plaintiffs' deadline
22 to file a First Amended Complaint and the Scheduling Conference because the
23 continuances will promote efficiency and conservation of judicial resources;

24 WHEREAS, no party will be prejudiced by the continuances;

25 WHEREAS, the continuances will not impact any other deadlines in the case.

26 _____
27 ⁴ Defendants' Motions to Dismiss and Motion to Strike discussed herein are
28 collectively referred to as Defendants' Motions.

STIPULATION

Based on the above and for good cause, the Parties by and through their counsel stipulate as follows:

1. Plaintiffs shall file their First Amended Complaint on or before May 24, 2023;
2. Defendants shall have at least 21 days to respond to the First Amended Complaint by answer, motion to dismiss, or as otherwise permitted by the Federal and/or Local Rules; and
3. The Motions Hearing set for June 9, 2023 and the Scheduling Conference set for June 30, 2023 shall be vacated and the Motions Hearing rescheduled to a date set by Defendants with the Court at the time of filing of any renewed motions and the Scheduling Conference shall be rescheduled to a date after any renewed motion to dismiss briefing is complete regarding the First Amended Complaint.

IT IS SO STIPULATED.

Dated: May 11, 2023

MCGUIREWOODS LLP

Bv /s/ Tanya L. Greene

TANYA L. GREENE
JONATHAN Y. ELLIS

Attorneys for X Corp., successor in
interest to named defendant
TWITTER, INC.

1 Dated: May 11, 2023

KEKER, VAN NEST &
PETERS LLP

2
3 Bv /s/ Paven Malhotra

4 PAVEN MALHOTRA
MATAN SHACHAM

5 Attorneys for Defendants
6 META PLATFORMS, INC. AND
7 INSTAGRAM LLC

8 Dated: May 11, 2023

WILSON SONSINI GOODRICH
& ROSATI, P.C.

9
10 Bv /s/ Amit O. Gressel

11 BRIAN M. WILLEN (*pro hac vice*
12 *forthcoming*)
13 AMIT Q. GRESSEL
ARIEL C. GREEN ANABA

14 Attorneys for Defendants
15 GOOGLE LLC, ALPHABET,
16 INC., AND YOUTUBE LLC

17 Dated: May 11, 2023

DAVIS WRIGHT
TREMAINE LLP

18
19 By

/s/ Scott R. Commerson

20 SCOTT R. COMMERSON

21
22 Attorneys for Defendant
23 AMAZON.COM, INC.

1 Dated: May 11, 2023

JENNER & BLOCK LLP

2
3 By

/s/ David R. Singer

DAVID R. SINGER

PRECIOUS S. JACOBS-PERRY

GREGORY D. WASHINGTON

Attorneys for Defendant

APPLE INC.

8 Dated: May 11, 2023

KAUFMAN LEGAL
GROUP, APC

10 By

/s/ Stephen J. Kaufman

STEPHEN J. KAUFMAN

GARY WINUK

Attorneys for Defendant

DNC SERVICES CORPORATION

15 Dated: May 11, 2023

ROTHNER, SEGALL &
GREENSTONE

17 By

/s/ Glenn Rothner

GLENN ROTHNER

ELI NADURIS-WEISSMAN

Attorneys for Defendants

AMERICAN FEDERATION OF

TEACHERS AND NATIONAL

EDUCATION ASSOCIATION

1 Dated: May 11, 2023

WILSON ELSEER MOSKOWITZ
EDELMAN & DICKER LLP

2
3 By /s/ Ian A. Stewart

IAN A. STEWART
ADAM E. WAYNE

4
5 Attorneys for Defendant
NATIONAL SCHOOL BOARDS
ASSOCIATION

6
7
8 Dated: May 11, 2023

LAW OFFICES OF MICHAEL E.
REZNICK

9
10 By /s/ Michael E. Reznick

MICHAEL E. REZNICK

11 Attorneys for Plaintiffs RICHARD
12 JACKSON, JULIE BRIGGS, and
13 GREGG BUCHWALTER

ATTESTATION

The undersigned hereby attests that all signatories listed above, and on whose behalf this Stipulation is submitted, concur in and have authorized the filing of this Stipulation. (*L.R. 5-4.3.4*).

/s/ Tanya L. Greene

Tanya L. Greene

CERTIFICATE OF SERVICE

I hereby certify that on May 11, 2023, the foregoing JOINT STIPULATION REGARDING FILING OF FIRST AMENDED COMPLAINT AND CONTINUING SCHEDULING CONFERENCE was filed electronically in the Court's Electronic Case Filing system ("ECF"); thereby upon completion the ECF system automatically generated a Notice of Electronic Filing ("NEF") as service through CM/ECF to registered e-mail addresses of parties of record in the case.

/s/ Tanya L. Greene

Tanya L. Greene